

**Federal Defenders  
OF NEW YORK, INC.**

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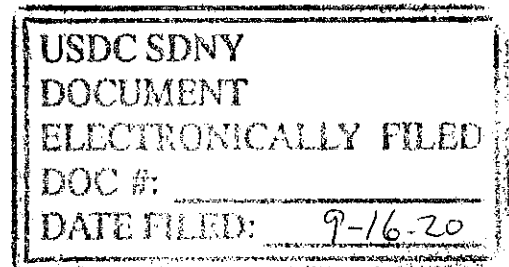
David E. Patton  
Executive Director  
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Southern District of New York  
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September 15, 2020

**By ECF/Email**

Honorable John F. Keenan  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007



Re: United States v. Christopher Torres, 19 Cr. 865 (JFK)

Hon. Judge Keenan:

I write with the consent of the Government and Pretrial Services to request a modification to the terms of Mr. Torres's bail.

Under the current terms, Mr. Torres may not reside in a home with internet access. Although Mr. Torres consented to the imposition of this condition on February 4, 2020, the COVID-19 pandemic has made it untenable. Mr. Torres lives in an apartment with his grandmother, his mother, and his 12-year-old brother, [REDACTED], who is entering the eighth grade at [REDACTED]. As [REDACTED]'s school prepares to reopen next week, they have allowed families to choose between fully remote learning and half-remote, half-in-person learning. Due to his grandmother's numerous medical issues, [REDACTED] will need to attend school on a fully remote schedule, via the internet. And [REDACTED] is not alone in preparing for a fully remote education: With one week to go until the start of the 2020-21 academic year, on September 21, 2020, more than 42% of New York City's public school students intend to participate in all-remote learning.<sup>1</sup>

Accordingly, I propose that Mr. Torres's bail be modified such that he is permitted to reside in a home with internet access, so long as there is only one device—a computer, laptop, or tablet—in the home capable of accessing the internet, protected by a password that is known only to [REDACTED] and his mother. As noted, the Government and Pretrial Services both consent to this modification. Thank you for considering it.

<sup>1</sup> Lauren Cook, *42% of NYC Students Opt for Remote Learning; Up from 26%, DOE Says*, PIX 11 (Sep. 14, 2020), at <https://www.pix11.com/news/back-to-school/42-of-nyc-students-opt-for-remote-learning-up-from-26-doe-says>.

Respectfully submitted,

/s/ Ariel Werner

Ariel Werner

Assistant Federal Defender

212-417-8770

CC: Rushmi Bhaskaran, Assistant U.S. Attorney  
John Moscato, U.S. Pretrial Services

*John F. Keenan*  
*2503*

*Application Granted*  
*September 16, 2020*  
*As ordered*